

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FELECIA S. HENDRICKS

Plaintiff,

v.

**WARDEN MCDONNELL AND
THE ALABAMA DEPARTMENT
OF CORRECTIONS.**

Defendants.

CIVIL ACTION NO: CV-05-714-F

REPORT OF PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26 (f), a meeting held on December 9 ,2005, telephonically and was attended by:

- a. Armand W. Pitters, Attorney for the Plaintiff.
- b. Gregory M. Biggs on behalf of Warden McDonnell and the Department of Corrections.

2. **Pre-Discovery Disclosures:** The parties will exchange within fourteen (14) days, the information required by Local Rule 26.1 (a)(1).

3. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan:

- a. Plaintiff states that discovery will be needed on the following subjects: Facts and circumstances surrounding the Plaintiff's termination; whether the Plaintiff was treated unequally and unfairly.
- b. The Defendants state the discovery will be needed on the events leading up to and including Plaintiff's termination.
- c. All discovery commenced in time to be completed by June 30, 2006.

d. Maximum number of thirty (30) interrogatories by each party to any other party.

Responses due within thirty (30) days of service.

e. Maximum number of thirty (30) requests for admissions by each party to any other party. Responses due within thirty (30) days of service.

f. Maximum number of ten (10) depositions by Plaintiff and ten (10) depositions for the Defendants. One deposition for each expert.

g. Reports from retained experts under Rule 26 (a) (2) due:

from Plaintiffs by date to be decided;

from Defendants by a date to be decided.

h. Supplementation under Rule 26 (e) shall be ongoing.

i. Plaintiff should be allowed until January 30, 2006 to join additional parties and until January 30, 2006 to amend the pleadings.

j. Defendants should be allowed until February 6, 2006 to join additional parties and until February 6, 2006 to amend the pleadings.

k. All potential dispositive motions should be filed by July 1, 2006.

l. The parties request a final pretrial conference in July 2006.

m. Final lists of trial evidence under Rule 26 (a) (3) should be due:

From Plaintiff: witnesses by July 10, 2006; exhibits by July 10, 2006.

From Defendants: witnesses by July 17, 2006; exhibits by July 17, 2006.

n. Parties should have seven (7) days after service of final lists of trial evidence to list objections under Rule 26 (a) (3).

o. The case should be ready for trial by July 31, 2006 and at this time is expected to last approximately three (3) days for trial.

4. Settlement: The parties agree that serious settlement discussions are premature at this juncture.

/s/Gregory Biggs

GREGORY BIGGS

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Assistant General Counsel

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